THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION

RON BURGET & DOS AMIGOS, LLC **Plaintiffs,** **v.** **R.A.M. ENTERTAINMENT GROUP, LLC & MARK SENAK** **Defendants.**	))))))))	**CASE NO.: 2:14 CV 373**

PLAINTIFF'S MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT

Comes now the Plaintiffs, by Law Office of Robin Remley and counsel, Robin G. Remley, and hereby requests that this honorable Court grant leave to file a Second Amended Complaint pursuant to Federal Trial Rule 15(A), in the interest of justice, and support thereof states as follows:

Defendant Mark Senak has filed a Motion to Dismiss based on Plaintiff's alleged failure to join a necessary party, Anthony Floros, a member of R.A.M. Entertainment Group, LLC. In the interest of justice and in the event of Plaintiff pursuing the "piercing the corporate veil" of R.A.M. Entertainment Group, LLC, Anthony Floros may become a necessary party as he is a member of R.A.M. Entertainment Group, LLC. Accordingly, Plaintiff hereby seeks leave to add Anthony Floros as a defendant in this matter, and requests that the court allow Plaintiff fourteen (14) days to file such Second Amended Complaint.

Plaintiff advises the court that but for the addition of Anthony Floros as a Defendant in relation to allegations regarding piercing the corporate veil, the context of litigation at hand and the content of the complaint will remain the same.

WHEREFORE, Plaintiff respectfully requests that this honorable Court grant Plaintiff leave to file a Second Amended Complaint for the limited purpose of joining a necessary party in interest, Anthony Floros, and allow Plaintiff fourteen (14) days within which to do so.

Respectfully submitted,

ROBIN G. REMLEY (22517-45)
Attorney for Plaintiff

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CERTIFICATE OF SERVICE

I certify that on September 15, 2015 service of a true complete copy of the foregoing pleading or paper was made upon each party or attorney of record herein by the CM/ECF electronic filing system.